

TM: CMP/RJN/BM  
F.#2012R01572

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

TAIYYIB ALI MUNIR,  
also known as  
"Ali Taiyyib Munir,"

Defendant.

- - - - - X

THE UNITED STATES ATTORNEY CHARGES:

I N F O R M A T I O N

Cr. No. 12-648  
(T. 18, U.S.C., §§ 371,  
981(a)(1)(C) and  
3551 et seq.; T. 21,  
U.S.C., § 853(p);  
T. 28, U.S.C., § 2461(c))

INSIDER TRADING CONSPIRACY

1. In or about and between December 2011 and July 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TAIYYIB ALI MUNIR, also known as "Ali Taiyyib Munir," together with others, did knowingly and willfully conspire to use and employ manipulative and deceptive devices and contrivances, directly and indirectly, contrary to Rule 10b-5 of the Rules and Regulations of the Securities and Exchange Commission, Title 17, Code of Federal Regulations, Section 240.10b-5, in that the defendant, together with others, did knowingly and willfully agree to (a) employ devices, schemes and artifices to defraud; (b) make untrue statements of material fact and omit to state material facts necessary in order to make the statements made, in light of the

circumstances under which they were made, not misleading; and (c) engage in acts, practices and courses of business which would and did operate as a fraud and deceit upon members of the investing public, in connection with the purchase and sale of securities of issuers with a class of securities registered under Section 12 of the Securities Exchange Act of 1934, by use of means and instrumentalities of interstate commerce and the mails, in that MUNIR, together with others, conspired to purchase and sell such securities while in possession of material, non-public information regarding said securities, contrary to Title 15, United States Code, Section 78j(b) and 78ff.

2. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendant TAIYYIB ALI MUNIR, together with others, committed and caused to be committed, among others, the following:

OVERT ACT

a. On or about January 3, 2012, the defendant MUNIR agreed to provide, in exchange for money, non-public information that was to appear in an earnings report for a Company, the identity of which is known to the United States

Attorney, which issues securities registered under Section 12 of the Securities Exchange Act of 1934.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, which constitutes or is derived from proceeds traceable to the commission of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

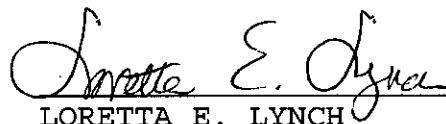
c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p))

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

vs.

TAIYYIB ALI MUNIR, *also known as*  
"Ali Taiyyib Munir,"

Defendant.

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**INFORMATION**

(T. 18, U.S.C., §§ 371, 981(a)(1)(c) and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Rachel Nash, Assistant U.S. Attorney (718-254-6072)*